

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 9/18/2023

By ECF:

The Honorable Analisa Torres  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *International Refugee Assistance Project, Inc v. United States Citizenship and Immigration Services*, 23 Civ. 2931 (AT)

Dear Judge Torres:

This action was brought by the International Refugee Assistance Project, Inc. (“IRAP”) against the United States Citizenship and Immigration Services (“USCIS” or the “Government”), pursuant to the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”). This case concerns a FOIA request that IRAP submitted to USCIS seeking records concerning the Central American Minors Refugee and Parole Program. As ordered by the Court, the parties respectfully submit this joint status update in this FOIA matter.

Since the parties’ last joint letter of July 25, 2023, the parties have continued to meet and confer regarding the scope of Plaintiff’s FOIA request and the Government’s production schedule. In addition, the Government made its second production of documents responsive to Plaintiff’s FOIA request on August 11, 2023, and its third production of documents responsive to Plaintiff’s FOIA request on August 24, 2023.

The Government believes that we have produced all non-exempt records responsive to Plaintiff’s FOIA request. The parties respectfully propose to file a joint status report on or before November 17, 2023 to allow them to meet and confer to determine whether there are any remaining issues in dispute and to update the Court about the status of the case.

Respectfully submitted,

/s/ Linda B. Evarts  
LINDA B. EVARTS  
International Refugee Assistance Project  
One Battery Park Plaza, 33<sup>rd</sup> Floor  
New York, NY 10004  
Tel: (516) 838-1655  
levarts@refugeerights.org

GRANTED. By **November 17, 2023**, the parties shall file a joint status report.

SO ORDERED.

Dated: September 18, 2023  
New York, New York

  
\_\_\_\_\_  
ANALISA TORRES  
United States District Judge